

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

IN RE: AMBER LYNN BOYCE

Debtor(s)

CHAPTER 13

Jack N.  
Zaharopoulos,  
Chapter 13 Trustee  
Movant  
vs

CASE NO. 4:24-bk-01356-MJC

Amber Lynn Boyce  
Respondent(s)

STIPULATION

AND NOW, this 23<sup>rd</sup> of June, 2025 the Debtor(s) and Jack N. Zaharopoulos, Standing Chapter 13 Trustee, do hereby stipulate that the Debtor(s) elect the following in satisfaction of the Trustee's Motion To Dismiss due to delinquent plan payments:

**1. CURE DEFAULT: (CHECK ONE)**

- Move to convert to Chapter 7 within 5 days.
- Move to voluntarily dismiss case within 5 days.
- Amend the plan within 14 days from the date of this Stipulation.
- Pay the arrears within \_\_\_\_\_ days (may not exceed 90 days) from the date of this Stipulation.

**2. WAGE ATTACHMENT: (CHECK ONE)**

- Within 14 days from the date of this stipulation, debtor(s) will file a Motion for Wage Attachment for payment of the regular monthly payments to the Trustee.
- Debtors(s) is unable to make payments by wage attachment because (be specific).
- Already wage attached, and will amend if necessary.

**3. FUTURE PAYMENTS:**

IT IS STIPULATED THAT BEGINNING WITH THE PAYMENT DUE IN THE MONTH OF July, 2025, DEBTOR(S) WILL MAKE ALL REGULAR MONTHLY PAYMENTS TO THE TRUSTEE DURING THE REMAINING TERM OF THE PLAN.

**4. DEFAULT:**

IN THE EVENT THE DEBTOR(S) DOES NOT PERFORM ACCORDING TO THIS STIPULATION, THE CASE MAY BE DISMISSED UPON CERTIFICATION OF THE TRUSTEE, WITHOUT FURTHER NOTICE TO PARTIES OR FURTHER HEARING. IF THE TRUSTEE'S MOTION SOUGHT DISMISSAL WITH PREJUDICE, THE DISMISSAL ORDER MAY INCLUDE A BAR ON RE-FILING A BANKRUPTCY AS OUTLINED IN THE MOTION.

  
\_\_\_\_\_  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee

Jack N. Zaharopoulos, Trustee

  
\_\_\_\_\_  
Amber Lynn Boyce  
Debtor

  
\_\_\_\_\_  
Counsel for Debtor(s)

Joint Debtor